



Brian A. Hill
 Member
 (202) 626-6014
 bhill@milchev.com
 March 21, 2014

VIA ECF

Hon. George B. Daniels
 United States District Judge
 Hon. Ronald L. Ellis
 United States Magistrate Judge
 United States District Court for the Southern District of New York
 500 Pearl Street
 New York, NY 10007-1312

Re: *Sokolow v. Palestine Liberation Organization*, No. 04-CV-397(GBD) (RLE)

Dear Judge Daniels and Judge Ellis:

I write on behalf of Defendants the Palestinian Authority (“PA”) and the Palestine Liberation Organization (“PLO”) to request that the Court extend the time for Defendants to file their responses to four letters sent by Plaintiffs this week until 7 days after the Court rules on Defendants’ Pending Motion for Reconsideration (DE 421). Because three of the letters at issue are addressed to Judge Daniels or Magistrate Judge Ellis, we are addressing this request to both of Your Honors.

On March 18, 2014, Plaintiffs sent a letter addressed to Judge Daniels pertaining to confidentiality (DE 436) and a letter addressed to Magistrate Judge Ellis pertaining to a request for sanctions (DE 437). On March 21, 2014, Plaintiffs sent a letter addressed to Judge Daniels pertaining to a supplemental exhibit list (DE 441). On March 21, 2014, Plaintiffs also sent a letter to defense counsel concerning the potential admissibility at trial of certain documents. In the ordinary course, Defendants’ responses to these letters would be due during the next two weeks.

At the hearing held on March 4, 2014, Judge Daniels revised the briefing schedule in this matter to allow the Court to consider and rule upon Defendants’ pending Motion for Reconsideration before requiring Defendants to engage in further briefing on motions *in limine* or for summary judgment. Under the schedule entered by Judge Daniels, the Motion for Reconsideration will be fully briefed by April 1, the parties will appear for oral argument on that Motion on April 11, and motions *in limine* and for summary judgment will not be due until May 2. DE 435 at 1. Judge Daniels set the deadlines in this fashion because he determined that, “in fairness and generosity,” “[i]f there’s a possibility that [Defendants] can convince me that this case should be dismissed solely on jurisdictional grounds and the merits of the case not addressed, then [Defendants] should have the opportunity to present that to me and for me to at least be able to review that before [Defendants] have to file motions that would be unnecessary.” March 4, 2014 Tr. at 27:6-12.

We believe that that rationale also applies to any responses Defendants may be required to serve to Plaintiffs’ letters dated March 18 and March 21. Each of those letters addresses issues that

MILLER
CHEVALIER

Hon. George B. Daniels
Hon. Ronald L. Ellis
March 21, 2014
Page 2

would be moot if the Court were to dismiss the case for lack of personal jurisdiction as Defendants' pending Motion for Reconsideration requests. Accordingly, because Defendants responses to those letters "would be unnecessary" if the Court were to grant the pending Motion for Reconsideration, there is good cause to extend the deadlines for responding to those letters until 7 days after the Court's ruling on the Motion for Reconsideration.

Accordingly, Defendants respectfully request that the Court extend the time for Defendants to respond to Plaintiffs' letters dated March 18 and March 21 until 7 days after any ruling denying Defendants' Motion for Reconsideration.

Sincerely,



Brian A. Hill

cc: All ECF Counsel